REMARKS

Applicants respectfully request further examination and reconsideration in view of the above amendments. Claims 1-19 remain pending in the case. Claims 1-3, 5, 6, 8-10 and 13-19 are rejected. Claims 4, 7, 11, 12 and 20 are objected to. Claim 20 is cancelled herein without prejudice. Claims 1-5, 14 and 16-18 are amended herein. No new matter has been added.

ALLOWABLE SUBJECT MATTER

Applicant wishes to thank the Examiner for the indication that Claims 4, 7, 11, 12 and 20 would be allowable if rewritten in independent form including the limitations of their base Claims and any intervening Claims. As a result of the claim amendments added herein in light of the notice of allowable subject matter, Applicants respectfully assert that Claims 14-19 are now in condition for allowance.

35 U.S.C. §102(e)

Claims 1-3 stand rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent 6,373,981 by de Queiroz et al., hereinafter referred to as the "de Queiroz '981" reference. Applicants have reviewed the cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 1-3 are not anticipated by de Queiroz '981 in view of the following rationale.

Applicants respectfully direct the Examiner to independent Claim 1 that

recites that an embodiment of the present invention is directed to (emphasis

added):

> A method of decomposing an image comprising the steps
> of:
> a)   decomposing the image into a plurality of stripes;
> b)   determining a layer base color, a layer size and a
> layer offset of at least one stripe of the plurality of stripes;
> c)   separating the stripe into a foreground layer, a
> background layer and a mask layer based on the layer base color
> and the layer offset; and
> d)   interpolating irrelevant pixel values in the foreground
> layer and background layer for coder efficiency.

Claims 2 and 3 that depend from independent Claim 1 provide further

recitations of the features of the present invention.

De Queiroz '981 and the claimed invention are very different. Applicants

understand de Queiroz '981 to teach a technique for compressing a pixel map.

In particular, de Queiroz '981 teaches a method for segmenting image data by

classifying a block of data using several criteria and subsequently updating the

classification considering the context of the data (col. 6, lines 24-28).

With reference to Figure 3 of de Queiroz '981, and the accompanying

description, a block of a pixel map (block 18 of pixel map 10 of Figure 2) is

acquired at step 210. The block is then classified at step 220. At step 230, the

block is segmented according to the classification. Applicants respectfully

assert that de Queiroz '981 specifically teaches classifying <u>a block.</u> A stripe can comprise a number of blocks (col. 1, lines 63-66). In particular, a block comprises N by N pixels, while a stripe can comprises N by M pixels, therefore a block is not a stripe.

In contrast, embodiments of the claimed invention are directed towards a method for decomposing an image including "decomposing the image into a <u>plurality of stripes</u>" (emphasis added). Applicants respectfully assert that a stripe as claimed is not a block as recited in de Queiroz '981. Furthermore, by specifically teaching the use of a block, de Queiroz '981 <u>teaches away</u> from the classifying a stripe.

Furthermore, the claimed embodiment recited the limitation of "determining a layer base color, a layer size and a layer offset of at least one stripe of the plurality of stripes." This limitation is described in the specification at step 440 of Figure 4, with the detailed recited in Figures 5 and 6 (page 5, line 16 through page 10, line 13). In contrast, de Queiroz '981 is silent as to determining any layer base color, any layer size and any layer offset.

Applicants respectfully assert that de Queiroz '981 in particular does not teach, disclose, or suggest a method of decomposing an image as claimed. Therefore, Applicants respectfully assert that nowhere does de Queiroz '981 teach, disclose or suggest the claimed embodiments of the present invention

as recited in independent Claim 1, and that this claim is thus in a condition for allowance. Therefore, Applicants respectfully submit the de Queiroz '981 also does not teach or suggest the additional claimed features of the present invention as recited in Claims 2 and 3 which depend from independent Claim 1. Therefore, Applicants respectfully submit that Claims 2 and 3 overcome the rejection under 35 U.S.C. § 102(e), and are in a condition for allowance as being dependent on an allowable base claim.

35 U.S.C. §103(a)

Claims 5, 6, 8-10 and 13 are rejected under 35 U.S.C. § 103(a) as being unpatentable over de Queiroz '981 and "On data Filling Algorithms for MRC Layers" by de Queiroz. Claims 5, 6, 8-10 and 13 are dependent on allowable base Claim 1. Therefore, Applicants respectfully submit that Claims 5, 6, 8-10 and 13 overcome the cited art of record and are patentable in view of 35 U.S.C. § 103(a).

CONCLUSION

In light of the above remarks, Applicants respectfully request reconsideration of the rejected claims. Based on the arguments presented above, Applicants respectfully assert that Claims 1-19 overcome the rejections of record and, therefore, Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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Dated: 1/7/ , 2004
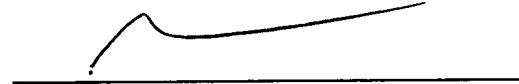
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